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Attorneys for Defendants  
ST. JUDE MEDICAL, CARDIOLOGY DIVISION, INC.  
and ABBOTT LABORATORIES

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

BRADLEY CASTILLO, an individual,

Plaintiff,

v.

ST. JUDE, MEDICAL CARDIOLOGY  
DIVISION, INC., a corporation; ABBOTT  
LABORATORIES, a corporation; and DOES 1  
through 20, inclusive,

Defendants.

Case No.

**DECLARATION OF KARA KEISTER IN  
SUPPORT OF DEFENDANTS' NOTICE  
OF REMOVAL TO UNITED STATES  
DISTRICT COURT**

Complaint Filed: December 1, 2021

1 I, Kara Keister, declare and state as follows:

2 1. I am attorney at Seyfarth Shaw LLP, attorneys of record for Abbott Laboratories and St.  
3 Jude Medical, Cardiology Division, Inc. ("Defendants"). I make this Declaration in support of  
4 Defendants' Notice of Removal. I have personal knowledge of the facts contained in this Declaration,  
5 and if called as a witness, I could and would testify as to their accuracy.

6 2. I am an attorney licensed to practiced law in the State of California and before this Court.  
7 All of the pleadings, correspondences, and other records in this matter are maintained in my office, in  
8 the ordinary course of business, under my direction and control. I have reviewed the pleadings and  
9 correspondences in preparing this Declaration.

10 3. Attached hereto as Exhibit 1 is a true and correct copy of the Summons and Complaint  
11 served by Plaintiff on Defendants. Attached hereto as Exhibit 2 is a true and correct copy of the Service  
12 of Process Transmittal, Civil Case Cover Sheet, and Notice of Case Assignment served with the  
13 Complaint. Attached hereto as Exhibit 3 is a copy of Defendants' Answer filed in the Superior Court of  
14 the State of California for the County of Alameda.

15 4. Exhibits 1, 2 and 3 constitute all of the pleadings served on Defendants and/or filed by  
16 Defendants in the state court action prior to filing this Notice of Removal. The only conference or  
17 hearings pending before the Alameda County Superior Court is the Case Management Conference set  
18 for March 23, 2022.

19 5. Defendants anticipate that the parties will propound written discovery, that depositions  
20 will be taken in this case, and that ultimately, Defendants will file a Motion for Summary Judgment.

21 I declare under penalty of perjury under the laws of the State of California and the laws of the  
22 United States of America that the foregoing is true and correct.

23 Executed this 7th day of January, 2022, in Sacramento, California.

24  
25 /s/ Kara D. Keister  
26 Kara D. Keister  
27  
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